

EXHIBIT 1

Second Supplemental Declaration of Paul Valone

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

SARA BETH WILLIAMS, BRUCE)	
KANE, JASON YEPKO, GUN OWNERS)	
OF AMERICA, INC., GUN OWNERS)	
FOUNDATION, GRASS ROOTS NORTH)	
CAROLINA, and RIGHTS WATCH)	
INTERNATIONAL,)	Civil Action No. 3:22-cv-630-MOC-DSC
)	
Plaintiffs,)	
)	
v.)	
)	
SHERIFF GARRY MCFADDEN,)	
in his official capacity as)	
Sheriff of Mecklenburg County,)	
and the MECKLENBURG COUNTY)	
SHERIFF’S OFFICE,)	
)	
Defendants.)	
)	

SECOND SUPPLEMENTAL DECLARATION OF PAUL VALONE

1. My name is Francis Paul Valone I. I am a U.S. citizen and resident of North Carolina. I make this declaration in support of Plaintiffs’ Complaint for Declaratory and Injunctive Relief. Unless otherwise stated, I make this declaration based on personal knowledge. If called as a witness, I can testify to the truth of the statements contained herein.


2. In a previous declaration filed with Plaintiffs’ Complaint, I explained that many of the members and supporters of Grass Roots North Carolina (“GRNC”) are being

irreparably harmed and have had their Second Amendment rights infringed because they have not had their permits issued timely, but rather have experienced significant and unconstitutional delays at the hands of Defendants. Doc. 1-2. In a supplemental declaration, I explained how members and supporters of the organizational plaintiffs continue to be irreparably harmed, in spite of Defendants having issued permits to the named plaintiffs and having claimed the matter is moot. Doc. 15-1.

3. Since then, GRNC has continued to hear from its members and supporters in Mecklenburg County, who continue to experience significant delays in the CHP permitting process due to Defendants' actions.
4. For example, one GRNC member completed the application process on January 9, 2023 (more than four months ago), but has yet to receive a CHP.
5. Another GRNC member submitted an application on February 8, 2023 (more than three months ago) but has yet to have the application processed or receive a CHP.
6. Until Defendants are forced to conform their actions to the Second Amendment, GRNC's members and supporters will continue to be irreparably harmed, and GRNC will continue to litigate on their behalf to defend their rights.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 18, 2023



Paul Valone